

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

BID PROTEST

FILED

Feb 9 2018

U.S. COURT OF
FEDERAL CLAIMS

ACCOUNT CONTROL TECHNOLOGY, INC.,)

Plaintiff,)

v.)

UNITED STATES OF AMERICA,)

Defendant.)

Case No. 18-206 C

Judge _____

PLAINTIFF'S NOTICE OF DIRECTLY RELATED CASE

Pursuant to Rule 40.2(a) of the Rules of the United States Court of Federal Claims ("RCFC"), Plaintiff, Account Control Technology, Inc. ("ACT") files this notice of a directly related case as follows:

(i) This action is directly related to another action pending before the Honorable Judge Thomas Wheeler of the United States Court of Federal Claims filed on April 7, 2017: *Account Control Technology, Inc. v. United States*, No. 17-493. This case was consolidated with the following actions on September 5, 2017: *Continental Service Group, Inc. v. United States*, COFC No. 17-449; *Pioneer Credit Recovery, Inc. v. United States*, No. 17-499, *Alltran Education, Inc. v. United States*, No. 17-517, *Progressive Financial Services, Inc. v. United States*, No. 17-558, *Collection Technology, Inc. v. United States*, No. 17-578, *Van Ru Credit Corp. v. United States*, No. 17-633. The case caption for the consolidated actions is No. 17-449.

(ii) This case is directly related to COFC Case No. 1:17-cv-00449-SGB pursuant to RCFC 40.2(a)(2). Both actions involve contracts awarded by the United States Department of

Education (“ED”) under Solicitation No. ED-FSA-16-R-0009 for debt collection services. The actions involve the same parties and are based on similar claims of unreasonable agency action.

(iii) Assigning ACT’s case and *Continental Service Group, Inc. v. United States*, COFC Case No. 1:17-cv-00449-SGB to a single judge can be expected to conserve judicial resources and promote the efficient determination of justice.

Respectfully submitted,

Dated: February 9, 2018

/s/ Jonathan S. Aronie
Jonathan S. Aronie
Attorney for Account Control Technology, Inc.

Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue, NW, Suite 100
Washington, D.C. 20006-6801
Washington, DC 20006-6801
Telephone (202) 747-1902
Direct Facsimile (202) 747-3800
Email: JAronie@sheppardmullin.com

CERTIFICATE OF SERVICE

I certify that I caused a copy of the foregoing Notice of Directly Related Case to be served by hand delivery and electronic mail this 9th day of February 2018 to:

U.S. Department of Justice
Commercial Litigation Branch
1100 L Street NW, 8th Floor
Washington DC 20530
nationalcourts.bidprotest@usdoj.gov

/s/ Jonathan S. Aronie
Jonathan S. Aronie
Attorney for Account Control Technology, Inc.

Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 100
Washington, DC 20006-6801
Telephone (202) 747-1902
Direct Facsimile (202) 747-3800
Email: JAronie@sheppardmullin.com